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Attorneys for Defendant  
FEREIDOUN KHALILIAN

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,

v.

FEREIDOUN KHALILIAN,  
Defendant.

Case No. 23-CR-222-RFB

**UNOPPOSED MOTION TO SEAL  
EXHIBIT C AND D TO  
DEFENDANT'S REPLY IN  
SUPPORT OF MOTION TO  
SUPPRESS RECORDED  
TELEPHONE CALLS;  
DECLARATION OF COUNSEL**

Defendant Fereidoun Khalilian, through his undersigned counsel, respectfully requests leave to file Defendant's Exhibit C and D to Defendant's Reply In Support of Motion to Suppress Recorded Telephone Calls (dkt 47) under seal. This unopposed motion is based on the attached declaration of counsel.

Respectfully submitted,

CUAUHTEMOC ORTEGA  
Federal Public Defender

DATED: February 2, 2024

By /s/ Jonathan C. Aminoff

JONATHAN C. AMINOFF  
ADAM OLIN  
Deputy Federal Public Defenders  
Attorney for FEREIDOUN KHALILIAN

**MEMORANDUM OF POINTS AND AUTHORITIES**

A court has supervisory powers over its records and files to seal documents under appropriate circumstances. *See United States v. Mann*, 829 F.2d 849, 853 (9th Cir. 1987). Local Rule IA 10-5(a) provides that a party may request that documents be filed under seal.

The underlying documents contain confidential personal identifying information of a non-party and the alleged victim. As such, defense counsel respectfully requests that Exhibit C and D to Defendant's Reply (dkt. 47) be filed under seal.

Respectfully submitted,

CUAUHTEMOC ORTEGA  
Federal Public Defender

DATED: February 2, 2024

By /s/ Jonathan C. Aminoff

JONATHAN C. AMINOFF

ADAM OLIN

Deputy Federal Public Defenders  
Attorney for FEREIDOUN KHALILIAN

**DECLARATION OF JONATHAN C. AMINOFF**

I, Jonathan C. Aminoff, declare:

1. I am a Deputy Federal Public Defender admitted to practice in the District of Nevada. I am counsel of record for defendant Fereidoun Khalilian.

2. By this motion, I request that the Court seal Mr. Khalilian's Exhibit C and D.

3. Exhibit C and D contain confidential personal identifying information about the alleged victim and a non-party to this case.

4. On January 31, 2024, the defense publicly filed redacted versions of these documents. The redactions were done by the government at the time the documents were produced to the defense and are not subject to a protective order.

5. On February 1, 2024, Assistant United States Attorney Sara Vargas, counsel for the government in this matter, alerted me that there were several private phone numbers that were not redacted from the exhibits. Ms. Vargas indicated, via email, that she does not oppose the this motion.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on February 2, 2024, in Los Angeles, California.

*/s/ Jonathan C. Aminoff*

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JONATHAN C. AMINOFF

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,  
Plaintiff,

v.

FEREIDOUN KHALILIAN,  
Defendant.

Case No. 23-CR-222-RFB

**PROPOSED ORDER TO SEAL  
EXHIBIT C AND D TO  
DEFENDANT'S REPLY IN  
SUPPORT OF MOTION TO  
SUPPRESS RECORDED  
TELEPHONE CALLS**

GOOD CAUSE HAVING BEEN SHOWN IT IS HEREBY ORDERED that:  
Mr. Khalilian's *motion* to file Exhibit C and D *under seal* is GRANTED.

DATED: February 2 , 2024

By   
HONORABLE RICHARD F. BOULWARE, II  
United States District Judge

Presented by:

/s/ Jonathan C. Aminoff  
JONATHAN C. AMINOFF  
Deputy Federal Public Defender